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UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 06 2000

WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 00-00072 SOM
	)	
Plaintiff,	)	SUPERSEDING INDICTMENT
	)	
vs.	)	[18 U.S.C. §§ 1344; 1956(h);
	)	1956(a)(1)(A)(i) and (a)(1)
NKEMULULAM TONY JOB,	)	(B)(i)]
aka Timothy Burns, Kaiser	)	
Anthony Ike, Christopher	)	
Harris, Robert Northcuff,	)	
	)	
Defendant.	)	
	)	

SUPERSEDING INDICTMENT

The Grand Jury charges:

Counts 1-6

1. From at least as early as May, 1999 through February 8, 2000, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff (Defendant), in the District of Hawaii and elsewhere, devised a scheme and artifice:

a. to defraud Seafirst Bank; Key Bank; Wachovia Bank, N.A.; and Bank of America, each of which is a financial institution as defined by Title 18, United States Code, Section 20, and

b. to obtain moneys and funds owned by and under the custody and control of Seafirst Bank; Key Bank; Wachovia Bank, N.A.; and Bank of America, by means of false and fraudulent pretenses, representations, and promises.

2. It was part of the scheme to defraud that Seafirst Bank; Key Bank; Wachovia Bank, N.A.; and Bank of America were contacted by persons claiming to be account holders. The person posing as an account holder would request a change of address and in some cases telephone number and would order additional checks which would be sent to the new address.

3. It was part of the scheme to defraud that Defendant would open accounts under an alias at banks in Hawaii with small cash deposits.

4. It was part of the scheme to defraud that the checks that were ordered from Seafirst Bank; Key Bank; Wachovia Bank, N.A.; and Bank of America would be made payable to one of the aliases that Defendant used to open the accounts at banks in Hawaii.

5. It was part of the scheme to defraud that the fraudulently drafted check was mailed or otherwise provided to

Defendant who deposited the check in the account that had previously been opened under that alias.

COUNT 1

On or about June 10, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the scheme and artifice as set forth above in that Defendant deposited Seafirst check #2009 in the amount of \$49,200 into a Bank of Hawaii account that had been opened in the name "Timothy Burns," in violation of Title 18, United States Code, Section 1344.

COUNT 2

On or about July 1, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the scheme and artifice as set forth above in that Defendant deposited Wachovia Bank check #9004 in the amount of \$48,907 into a Bank of Hawaii account that had been opened in the name "Christopher Harris," in violation of Title 18, United States Code, Section 1344.

COUNT 3

On or about July 9, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the

scheme and artifice as set forth above in that Defendant deposited Key Bank check #206 in the amount of \$49,802 into a Bank of Hawaii account that had been opened in the name "Timothy Burns," in violation of Title 18, United States Code, Section 1344.

COUNT 4

On or about July 14, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the scheme and artifice as set forth above in that Defendant deposited Wachovia Bank check #9012 in the amount of \$47,900 into a Bank of Hawaii account that had been opened in the name "Christopher Harris," in violation of Title 18, United States Code, Section 1344.

COUNT 5

On or about December 9, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the scheme and artifice as set forth above in that Defendant deposited Bank of America check #524 in the amount of \$49,721 into a First Hawaiian Bank account that had been opened in the name "Robert Northcuff," in violation of Title 18, United States Code, Section 1344.

COUNT 6

On or about December 21, 1999, in the District of Hawaii, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, executed the scheme and artifice as set forth above in that Defendant deposited Bank of America check #528 in the amount of \$23,900 into a First Hawaiian Bank account that had been opened in the name "Robert Northcuff," in violation of Title 18, United States Code, Section 1344.

COUNT 7

From an unknown date, but at least as early as June 21, 1999, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, did knowingly and intentionally combine, confederate, and agree with various other persons unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce with property that was the proceeds of bank fraud in violation of Title 18, United States Code, Section 1344, knowing that the property represented the proceeds of some form of unlawful activity while acting with the intent to promote bank fraud in violation of Title 18, United States Code, Section 1344, acting with the knowledge that the transaction is designed in whole and in part to disguise the nature, location, source, ownership, and control of the proceeds of the bank fraud

violations, and acting with the knowledge that the transactions were designed in whole and in part to avoid transaction reporting requirements.

Manner and Means

1. It was part of the manner and means of the conspiracy that the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, would wait until the stolen checks had cleared and then would withdraw the proceeds of these checks in amounts under \$10,000.

2. It was part of the manner and means of the conspiracy, that the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, would keep part of the proceeds and then mail the remainder to another member of the conspiracy.

Overt Acts

3. In furtherance of the conspiracy and in order to effect the objectives thereof, the conspirators performed the following overt acts, among others, in the District of Hawaii and elsewhere:

a. On June 21, 1999, the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff (Defendant), withdrew \$9,860 from the "Timothy Burns" account at the Bank of Hawaii at its Waiakamilo Branch.

b. On June 21, 1999, the Defendant withdrew \$9,600 from the "Timothy Burns" account at the Bank of Hawaii at its Ala Moana Branch.

c. On June 22, 1999, the Defendant withdrew \$9,680 from the "Timothy Burns" account at the Bank of Hawaii at its Keeaumoku Branch.

d. On June 22, 1999, the Defendant withdrew \$9,420 from the "Timothy Burns" account at the Bank of Hawaii at its Ward Plaza Branch.

e. On June 23, 1999, the Defendant withdrew \$9,500 from the "Timothy Burns" account at the Bank of Hawaii at its Ala Moana Branch.

f. On July 13, 1999, the Defendant withdrew \$9,960 from the "Christopher Harris" account at the Bank of Hawaii at its Waiakamilo Branch.

g. On July 13, 1999, the Defendant withdrew \$9,640 from the "Christopher Harris" account at the Bank of Hawaii at its Ward Plaza Branch.

h. On July 14, 1999, the Defendant withdrew \$9,850 from the "Christopher Harris" account at the Bank of Hawaii at its Waialae-Kahala Branch.

i. On July 14, 1999, the Defendant withdrew \$9,760 from the "Christopher Harris" account at the Bank of Hawaii at its Ala Moana Branch.

j. On November 18, 1999, the Defendant withdrew \$9,900 from the "Robert Northcuff" account at the First Hawaiian Bank at its Kapiolani Branch.

k. On November 18, 1999, the Defendant withdrew \$9,780 from the "Robert Northcuff" account at the First Hawaiian Bank at its Main Branch.

l. On November 19, 1999, the Defendant withdrew \$9,980 from the "Robert Northcuff" account at the First Hawaiian Bank at its Liliha Branch.

m. On November 19, 1999, the Defendant withdrew \$9,950 from the "Robert Northcuff" account at the First Hawaiian Bank at its King-Liliha Branch.

All in violation of Title 18, United States Code, Section 1956(h).

Counts 8-20

1. On or about the dates set forth below, in the District of Hawaii the Defendant, Nkemululam Tony Job, aka Timothy Burns, Kaiser Anthony Ike, Christopher Harris, Robert Northcuff, did knowingly and willfully conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit, cashing a check made payable to cash drawn on the account that he had opened in a false name, which involved the proceeds of a specified unlawful activity, that is, bank fraud, with the intent to promote the carrying on of specified



unlawful activity, to wit: bank fraud and acting with the knowledge that the transactions were designed in whole and in part to avoid transaction reporting requirements. While conducting and attempting to conduct such financial transactions, the Defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity:

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Branch Where Check Was Cashed</u>
8	6/21/1999	\$9,680	Bank of Hawaii, Waiakamilo Branch
9	6/21/1999	\$9,600	Bank of Hawaii, Ala Moana Branch
10	6/22/1999	\$9,680	Bank of Hawaii, Keeaumoku Branch
11	6/22/1999	\$9,420	Bank of Hawaii, Ward Plaza Branch
12	6/23/1999	\$9,500	Bank of Hawaii, Ala Moana Branch
13	7/13/1999	\$9,960	Bank of Hawaii, Waiakamilo Branch
14	7/13/1999	\$9,640	Bank of Hawaii, Ward Plaza Branch
15	7/14/1999	\$9,850	Bank of Hawaii, Waialae-Kahala Branch
16	7/14/1999	\$9,760	Bank of Hawaii, Ala Moana Branch
17	11/18/1999	\$9,900	First Hawaiian Bank, Kapiolani Branch

18	11/18/1999	\$9,780	First Hawaiian Bank, Main Branch
19	11/19/1999	\$9,980	First Hawaiian Bank, Liliha Branch
20	11/19/1999	\$9,950	First Hawaiian Bank, King-Liliha Branch

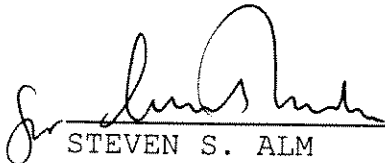
All in violation of Title 18, United States Code,  
Sections 1956(a)(1)(A)(i) and (a)(1)(B)(i).


DATED: April 6, 2000, at Honolulu, Hawaii.


A TRUE BILL

/s/

FOREPERSON, GRAND JURY

  
STEVEN S. ALM  
United States Attorney  
District of Hawaii

  
ELLIOT ENOKI  
First Assistant U.S. Attorney

  
OMER G. POIRIER  
Assistant U.S. Attorney

UNITED STATES vs. NKEMULULAM TONY JOB  
Cr. No. 00-00072 SOM  
"Superseding Indictment"